

# Exhibit 7



June 18, 2024

**VIA E-MAIL**

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**Re:      *Headwater Research LLC v. Samsung Electronics Co., Ltd. et al., Case No. 2:23-cv-00641 (E.D. Tex.)***

Dear Counsel:

Samsung Electronics Co., Ltd. ("**Samsung**") has filed an *inter partes* review (IPR) petition (IPR2024-01051) with the Patent Trial and Appeal Board (PTAB) to address the validity of claims 1-30 of U.S. Patent No. 8,639,811 ("**the '811 Patent**"). The tables in attached Appendix A list all grounds, challenged claims, and references asserted in IPR2024-01051.

I write to inform you that Samsung hereby stipulates that, if the PTAB institutes IPR2024-01051, Samsung agrees not to pursue the same grounds (listed in Appendix A below) in the district court litigation. *Apple, Inc. v. SEVEN Networks, LLC*, IPR2020-00156, Paper 10 at 19 (June 15, 2020); *see also Sand Revolution II, LLC v. Continental Intermodal Group-Trucking LLC*, IPR2019-01393, Paper 24 at 12 (June 16, 2020).

Sincerely,

A handwritten signature in black ink, appearing to read "Thad Kodish", written in a cursive style.

Thad Kodish

Attorney for Samsung Electronics Co., Ltd.



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**Appendix A – Grounds and Prior Art References Used in IPR2024-01051**

<b>Ground</b>	<b>Claim(s)</b>	<b>§103</b>
1A	1, 3, 6, 8-11, 14, 19-20	Rao
1B	2	Rao-Panpaliya
1C	4, 13, 21, 23, 25	Rao-Jones
1D	17	Rao-Jones-Jajoo
1E	22	Rao-Jones-Cole
1F	5	Rao-Montemurro
1G	7	Rao-Akhtar
1H	18	Rao-Ramesh
1I	12, 15-16, 26-27, 29-30	Rao-Freund
1J	28	Rao-Freund-Bedi
2	1, 24	Rao-Pregont-Jones

**List of References**

<b>Reference Name</b>	<b>Details</b>
Rao	U.S. Pat. App. Pub. No. 2006/0039354
Panpaliya	U.S. Pat. No. 8,400,491
Jones	U.S. Pat. No. 8,285,850
Jajoo	U.S. Pat. App. Pub. No. 2008/0162981
Cole	U.S. Pat. App. Pub. No. 2008/0080458
Montemurro	U.S. Pat. App. Pub. No. 2009/0207817



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Reference Name	Details
Akhtar	U.S. Pat. App. Pub. No. 2009/0185527
Ramesh	U.S. Pat. App. Pub. No. 2009/0228951
Freund	U.S. Pat. No. 5,987,611
Bedi	U.S. Pat. App. Pub. No. 2010/0281154
Pregont	U.S. Pat. App. Pub. No 2007/0032230